

U.S. DISTRICT COURT	
NORTHERN DISTRICT OF TEXAS	
FILED	
MAY - 6 2014	
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CLERK, U.S. DISTRICT COURT	
By	Deputy

United States District Court

NORTHERN DISTRICT OF TEXAS
UNITED STATES OF AMERICA

V.

COMPLAINT

Lawrence Shahwan

CASE NUMBER: 3:14-MJ-321-BF

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. In or about December 2013 in Dallas County, in the Northern District of Texas and elsewhere, defendant(s) did,

knowingly and intentionally combine, conspire, confederate and agree with other persons known and unknown to commit the following offense against the United States: to possess with intent to distribute a Schedule I controlled substance to wit: marijuana,

in violation of Title 21 United States Code, Section(s) 841(a)(1) & 846. I further state that I am a(n) Task Force Officer of the Drug Enforcement Administration (DEA) and that this complaint is based on the following facts:

See attached Affidavit of Task Force Officer, Jason Daniels, DEA, which is incorporated and made a part hereof by reference.

Continued on the attached sheet and made a part hereof: Yes No

Signature of Complainant
Jason Daniels
Task Force Officer, DEA

Sworn to before me and subscribed in my presence, on this 6th day of May, 2014, at Dallas, Texas.

PAUL D. STICKNEY
UNITED STATES MAGISTRATE JUDGE
Name & Title of Judicial Officer

Signature of Judicial Officer

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Jason G. Daniels, a Task Force Officer with the Drug Enforcement Administration (DEA), being duly sworn, depose and state as follows:

Introduction

1. I am a certified Texas Peace Officer and have been employed with the Denton County Sheriff's Office for approximately 10 years. I have been assigned to the Denton County Drug Enforcement Unit for over two years and I am a Deputized Task Force Officer with DEA, where I have been assigned to the Dallas Field Division Office to conduct investigations of violations of federal drug statutes for approximately one year. I have conducted and participated in previous investigations of violations of the drug laws of the United States as well as money laundering, including violations of 21 U.S.C. §§ 841(a)(1), 846, and 863; and 18 U.S.C. §§ 1956 and 1957.

2. I am a law enforcement officer of the United States within the meaning of Section 2510(7) of Title 18, United States Code, and I am empowered by law to conduct criminal investigations and to make arrests for federal felony offenses.

3. I have reason to believe that, Lawrence Shahwan has unlawfully committed a violation of 21 U.S.C. §§ 841(a) (1) and 846, that is: conspiracy to distribute a Schedule I controlled substance.

4. I obtained the following information from my own observations and information provided to me by other law enforcement officers involved in the investigation.

Facts

5. On December 4, 2013, a deputy with the Denton County Sheriff's Office conducted a traffic stop on a silver Ford F-150 crew pickup, Texas LP#BF37135 (VIN-1FTFW1EVXAFB67760) and identified the driver as Craig Starnes. Starnes informed the officer that he (Starnes) had just departed from a property in Whitesboro, Texas, and was currently in route to his residence in Plano, Texas. The officer gained consent to search the vehicle from Starnes and located approximately 2.7 grams of hashish oil, marihuana residue, and items common with maintaining a marihuana cultivation operation inside the vehicle. A database search revealed the owner of the truck to be Lawrence Shahwan. Starnes was taken into custody and transported and booked into the Denton County Jail.

6. A search of public records revealed Lawrence Shahwan was associated with property located at 657 County Road 175, Whitesboro, Cooke County, Texas.

7. On December 10, 2013, investigators with the Denton County Sheriff's Office traveled to the property in Whitesboro, Texas, and located a metal building with several out buildings. A search warrant was subsequently obtained for the property. Two male subjects, identified as William Venable and Jason Bond, were located in the main structure. During the search of the property a total of 596 marihuana plants, approximately 12.9 pounds of loose and packaged marihuana, 13 grams of hashish oil and a large quantity of unused butane gas canisters were located within the buildings on the property. A large quantity of empty butane gas canisters and equipment utilized to

make butane hash oil was located outside the main structure. During the search a male, identified as Justin Laney, arrived at the location. All three males were taken into custody and transported to the Denton County Jail.

8. On December 10, 2013, Laney provided a custodial interview detailing his participation in the marihuana growing operation. Laney stated Lawrence Shahwan had approached him (Laney) about going into the indoor marihuana growing business shortly after they first met in December 2012. Laney stated he and Lawrence Shahwan were to split the profits from the marihuana grow 50-50. Laney stated Lawrence Shahwan provided the financial backing and purchased the marihuana growing equipment from Lonestar Hydroponics located on at 1348 Motor Circle Drive, Dallas, Texas. Laney stated he recruited Venable to build out the indoor grow operation because they were childhood friends and Venable had prior experience constructing indoor grows. Laney identified Starnes as Lawrence Shahwan's trusted employee who was involved in the everyday matters of the marihuana growing operation. Laney identified a warehouse, located at 3808 Cavalier, Garland, Texas, as a location leased and operated by Lawrence Shahwan where the marihuana growing equipment would be delivered and stored after purchase. Laney stated the equipment would be picked up when needed from the warehouse and transported to the marihuana grow operation in Cooke County, Texas.

9. On December 10, 2013, Venable provided a custodial interview detailing his participation in the marihuana growing operation. Venable stated the indoor marihuana grow was financed by Lawrence Shahwan. Venable stated he was recruited

by Laney to build the indoor grow operation because he (Venable) has previously constructed other indoor grow operations. Venable stated he had been to the warehouse located at 3808 Cavalier, Garland, Texas, to pick up grow lights, butane canisters and other supplies needed for the marihuana grow. Venable stated he has accompanied Starnes and Laney to Lonestar Hydroponics, located at 1348 Motor Circle Drive, Dallas, Dallas County, Texas, on more than one occasion to purchase supplies needed for the marihuana growing operation. Venable stated during one of the trips he observed a check written in the amount of \$125,000.00, to Lonestar Hydroponics from Sacred Sun Botanicals, which is one of Lawrence Shahwan's businesses. Venable stated if anything was needed for the marihuana grow Laney or Starnes would contact Lawrence Shahwan and obtain a check or currency, then purchase the supplies from Lonestar Hydroponics.

10. On January 2, 2014, Rakan Shahwan, the brother of Lawrence, was taken into custody for an outstanding felony warrant while operating a 2013 BMW which was registered to Lawrence Shahwan. During an inventory of the vehicle a receipt for \$9,000.00 worth of butane was found in the trunk of the vehicle and a receipt for the construction dumpster which was utilized at the marihuana grow operation site in Cooke County, Texas, was found in the passenger compartment of the vehicle.

11. On January 22, 2014, investigators spoke with Paul Osborn, the owner of the warehouse property located at 3808 Cavalier, and learned Lawrence Shahwan's lease had expired. According to Osborn, Lawrence Shahwan had informed Osborn that he (Lawrence Shahwan) did not want anything in the warehouse and everything could be

throw away by Osborn. Investigators subsequently obtained written consent to search the property from Osborn. During the search, investigators observed two large grow lights which were consistent with the grow lights located at the marihuana grow in Cooke County, Texas.

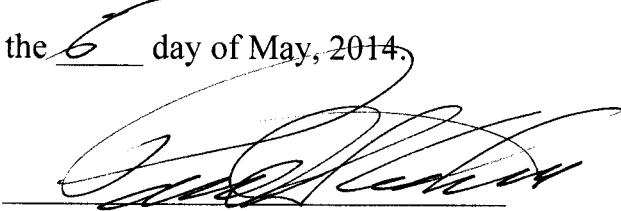
Conclusion

12. For the reasons stated above, I believe that probable cause exists that Lawrence Shahwan has committed a violation of 21 U.S.C. §§ 841(a)(1) & (b)(1)(C) and 846, that is: conspiracy to distribute a Schedule I controlled substance.



JASON G. DANIELS
Task Force Officer
Drug Enforcement Administration

Subscribed and sworn to before me on the 6 day of May, 2014.



PAUL D. STICKNEY
United States Magistrate Judge